

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

JEROME CORSI,)	
)	
)	
Plaintiff,)	
)	
v.)	CASE NO.: 1:18cv2885
)	
ROBERT MUELLER, individually and in his)	
official capacity as Special Counsel, FEDERAL)	
BUREAU OF INVESTIGATION, NATIONAL)	
SECURITY AGENCY, CENTRAL)	
INTELLIGENCE AGENCY, UNITED)	
STATES DEPARTMENT OF JUSTICE, JEFF)	
BEZOS, THE WASHINGTON POST, and)	
MANUEL ROIG-FRANZIA,)	
)	
Defendants.)	
)	

**CONSENT MOTION FOR ONE-MONTH EXTENSION OF TIME
TO RESPOND TO AMENDED COMPLAINT**

Defendants Federal Bureau of Investigation, National Security Agency, Central Intelligence Agency, United States Department of Justice, and Robert Mueller in his official capacity as Special Counsel (together, “the Government”), with the consent of Plaintiff, hereby move for a one-month extension of time, from February 19, 2019, to March 19, 2019, to answer or otherwise respond to Plaintiff’s amended complaint.

1. Plaintiff filed his original complaint (ECF No. 1) on December 9, 2018. That complaint was served on the Government on December 19, 2018.

2. On January 21, 2019, Plaintiff filed an amended complaint (ECF No. 15), which added several new allegations and claims against the Government.

3. Pursuant to Rules 15(a)(3), 12(a)(2), and 6(a)(1) of the Federal Rules of Civil Procedure, the Government's answer or other response to the amended complaint is due February 19, 2019.

4. The Government respectfully requests that its deadline to respond to the amended complaint be extended by one month, from February 19, 2019, to March 19, 2019. The Government requires the additional time because of delays caused by the lapse in appropriations to the Department of Justice, and because the amended complaint contains several new allegations and claims that the Government must address.

5. Plaintiff's counsel has informed the undersigned counsel that Plaintiff consents to this request.

WHEREFORE, the Government respectfully requests that the Court extend until March 19, 2019, the deadline for the Government to file its answer or other response to Plaintiff's amended complaint.

Dated: February 7, 2019

Respectfully submitted,

JAMES J. GILLIGAN
Acting Branch Director

/s/ Elizabeth Tulis
ELIZABETH TULIS
Trial Attorney
Federal Programs Branch
U.S. Department of Justice, Civil Division
1100 L Street, NW
Washington, DC 20005
Tel: (202) 514-9237
Fax: (202) 616-8470
E-mail: elizabeth.tulis@usdoj.gov

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 7, 2019, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of electronic filing to the parties.

/s/ Elizabeth Tulis
ELIZABETH TULIS

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

JEROME CORSI,)	
)	
)	
Plaintiff,)	
)	
v.)	CASE NO.: 1:18cv2885
)	
ROBERT MUELLER, individually and in his)	
official capacity as Special Counsel, FEDERAL)	
BUREAU OF INVESTIGATION, NATIONAL)	
SECURITY AGENCY, CENTRAL)	
INTELLIGENCE AGENCY, UNITED)	
STATES DEPARTMENT OF JUSTICE, JEFF)	
BEZOS, THE WASHINGTON POST, and)	
MANUEL ROIG-FRANZIA,)	
)	
Defendants.)	
)	

[PROPOSED] ORDER

Having considered the Government's Consent Motion for One-Month Extension of Time to Respond to Amended Complaint, the Motion is hereby GRANTED for good cause shown, and it is

ORDERED that the Government's deadline to answer or otherwise respond to the plaintiff's amended complaint is hereby extended to and including March 19, 2019.

SO ORDERED.

Dated: _____, 2019

HON. ELLEN S. HUVELLE
United States District Judge